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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

Missy Marrel Carson,	)	Case No. 1:21-cv-00004-EPG
	)	
Plaintiff,	)	STIPULATION AND ORDER FOR
	)	EXTENSION OF TIME
vs.	)	
	)	
Kilolo Kijakazi, Acting	)	
Commissioner of Social Security,	)	
	)	
Defendant.	)	
	)	
	)	
	)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from November 29, 2021 to January 28, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Good cause exists for this extension. Counsel has recently received a greater number of Answers and Certified Administrative Records from defendant in cases in this district, and the three other California Districts, each of which require settlement negotiations or merit briefing. Counsel has a greater

1 than usual number of merit briefs due in November and December 2021. Thus, Counsel is  
2 requesting an extension through January 28, 2022 to accommodate the number of cases due.  
3 For the weeks of November 15, 2021 and November 22, 2021, Counsel has 10 merit briefs,  
4 several reply and settlement letters. Counsel also has 20 administrative hearings before the  
5 Office of Hearings Operations. For the month of December 2021, Counsel has 20 merit briefs  
6 scheduled due.

7 Counsel has also received an increase in the number of AC denials which require a  
8 review for possible filing in US District Court. Lastly, Counsel has end of the year business  
9 reviews to conduct as the CEO of Peña & Bromberg, PC.

10 Due to the increase in certified administrative records being filed by defendant, Counsel  
11 for Plaintiff has a larger than usual number of briefs due for the months of November and  
12 December 2021.

13 Compounding the issue of an increased number of merit briefs due, Counsel has  
14 preplanned vacation days for the Thanksgiving and Christmas holidays. Counsel respectfully  
15 requests the Court granted the requested extension.

16 Counsel for the Plaintiff does not intend to further delay this matter. Defendant does not  
17 oppose the requested extension. Counsel apologizes to the Defendant and Court for any  
18 inconvenience this may cause.

19  
20 Respectfully submitted,

21 Dated: November 11, 2021 PENA & BROMBERG, ATTORNEYS AT LAW

22  
23 By: /s/ Jonathan Omar Pena  
24 JONATHAN OMAR PENA  
25 Attorneys for Plaintiff

26 Dated: November 11, 2021 PHILLIP A. TALBERT  
27 Acting United States Attorney  
28 DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX

Social Security Administration

By: \*/s/ Oscar Gonzalez de Llano

Oscar Gonzalez de Llano

Special Assistant United States Attorney

Attorneys for Defendant

(\*As authorized by email on November 11, 2021)

**ORDER**

Pursuant to the parties' stipulation (ECF No. 14), IT IS HEREBY ORDERED that Plaintiff shall file and serve an opening brief no later than January 28, 2022. All subsequent deadlines are extended accordingly.

IT IS SO ORDERED.

Dated: **November 15, 2021**

/s/ Eric P. Grogan  
UNITED STATES MAGISTRATE JUDGE